

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
C.A. No. 1:23 CV-00681-TDS-JEP**

SANG CHI LIU,

Plaintiff,

V.

LEXISNEXIS RISK SOLUTIONS, INC.,

Defendant.

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**JOINT REPORT PURSUANT TO LOCAL RULE 5.5 FOR THE FILING OF  
SEALED DOCUMENTS**

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Pursuant to LR5.5, the parties, through counsel, have met and conferred and submit their proposed Joint Report Pursuant to Local Rule 5.5 for the Filing of Sealed Documents as follows:

1.     Conference: The parties have discussed the issues of confidentiality raised in this case and the potential need for filing documents under seal. That discussion included the nature of any confidential documents that may be involved in the case, the possibility of using stipulations to avoid the need to file certain documents, and the possibility of agreed-upon redactions of immaterial confidential information in filings to avoid the need for filing documents under seal.

2.     Default: The parties certify that few, if any, documents will be filed under seal. The parties agree to use the default procedures of LR 5.4(c). In addition, if the party filing the motion to seal is not the party claiming confidentiality, the filing party must meet and confer with the party claiming confidentiality as soon as practicable, but at least

two (2) days before filing the documents, to discuss narrowing the claim of confidentiality. The motion to seal must certify that the required conference has occurred, and the party claiming confidentiality must file supporting materials required by LR 5.4(c)(3) within 14 days of the motion to seal.

3. Other Relevant Information: The parties anticipate there will be the need for a protective order in this case and will confer separately and submit a joint stipulated protective order for the Court's consideration taking into account the default procedures set forth in LR 5.4.

Respectfully submitted, this 22<sup>nd</sup> day of December 2023.

/s/  
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## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document was served electronically upon the following via the CM/ECF system:

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This the 22<sup>nd</sup> day of December 2023

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